

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION**

UNITED STATES OF AMERICA)	No. 20-CR-00006
Plaintiff,)	
v.)	Honorable Judge
ROMEL MURPHY,)	C.J. Williams , Presiding
Defendant)	

MOTION TO EXTEND DEADLINES FOR PLEA ENTRY AND TRIAL

NOW COMES THE DEFENDANT, Romel Murphy, by and through his attorney, Jeffrey B. Steinback, and respectfully asks this Honorable Court to extend the deadlines for the entry of his plea agreement and the corresponding trial date for 45 days, or to a date later, consistent with the calendar requirements of the Court. In support, the following is offered:

1. On February 6, 2020 Mr. Murphy was charged with wire fraud and identity theft and arraigned in this Honorable Court. The date currently set for notification of a plea is 09/14/2020.
2. Mr. Murphy, and his attorney, the undersigned, fully intend to resolve this case by way of a plea agreement, obviating any need for a trial to occur.
3. Due to the Covid-19 restrictions in the State of Illinois and the City of Chicago, Mr. Steinback and Mr. Murphy are subject to quarantine protocols that have been implemented here. They have not been able to meet in person and discuss important aspects of the plea agreement, although many conversations via phone have taken place with both Mr. Steinback and Mr. Murphy, as well as more recent calls between

Mr. Steinback and Ms. Lundquist. Mr. Murphy has recently been able to find part time work. If he were to travel to Iowa, he would be placed under quarantine restrictions and not be able to return to work for 14 days. He would expose his children, and his wife, who would then be subject to a 14 day quarantine from work and day care. With incomes being already stretched and Covid-19 taking a toll on most families, having to quarantine would cause a severe hardship for everyone in the household.

4. The landscape of Covid-19 is constantly changing, but every effort will be made to insure that this plea go forward at the continued date, if this Honorable Court should see fit to grant it.
5. Also, Mr. Steinback on Sunday, September 13, 2020, received a call from his younger brother, Rick, that his cancer, multiple myeloma for which he began treatment about a year ago, has advanced in severity, reaching an alarming level of aggression in a very short period of time. As one might imagine, this is a terrible blow to everyone in the family. Jeff's brother, Rick, began this week an experimental series of potentially life-prolonging treatments; that have very serious side effects, in a clinic near his home which is out of state. The downside is that this same treatment presents high risks, including myocardial infarction and excruciating pain, but the reality stands that without this experimental treatment, the cancer will run unchecked. Rick has asked his brother, Jeff, to be there for these very difficult treatments. Mr. Steinback, the oldest of 3 brothers, has always looked out for his brothers, and is praying that the Court will see fit to grant this motion.
6. This will be our final request for a continuance, as we fully intend to proceed with the plea agreement, obviating any need for a trial.

7. AUSA Kyndra Lundquist has been contacted and takes no position to this request, leaving it to the discretion of this Honorable Court.

WHEREFORE, the defendant, Romel Murphy, prays for an Order granting this motion to extend the Entry of a Plea and to correspondingly extend the trial date accordingly, to a time after 45 days, consistent with the calendar of this Honorable Court.

Respectfully submitted,

/s/ Jeffrey B. Steinback

Jeffrey B. Steinback

Attorney at Law

8351 Snaresbrook Rd.

Roscoe, IL 61073

847-624-9600